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APPLICATION GRANTED
SO ORDERED 
VERNON S. BRODERICK
U.S.D.J.

August 16, 2024

VIA ECF

Hon. Vernon S. Broderick
United States District Judge
Southern District of New York
Thurgood Marshall United States Courthouse
40 Foley Square
New York, New York 10007

Dated: August 21, 2024

Re: *Frank Nash v. United Healthcare Services, Inc, et al.*
Case No.: 1:24-cv-02160 (VSB)

Dear Judge Broderick:

This office represents the Defendants, United Healthcare Services, Inc. and Oxford Health Insurance, Inc. (collectively, “Defendants”), in the above referenced matter. Pursuant to Rule 1.G. of Your Honor’s Individual Rules and Practices, Defendants respectfully request an extension of time to file a joint letter briefly describing the lawsuit with a proposed case management plan and scheduling order from August 16, 2024 to and including August 30, 2024. On August 9, 2024, the Court entered an order for the parties to submit a joint letter briefly describing the lawsuit with a proposed case management plan and scheduling order by August 16, 2024. (ECF No. 27).¹ Due to the tight turnaround for this filing, counsel for the parties have been unable to discuss potential deadlines for a proposed case management plan and scheduling order. Further, complying with this deadline is further constrained as counsel for Defendant is about to go on vacation. As such, Defendants request a two-week extension to comply with the Court order dated August 9, 2024.

This is Defendants’ first request to this Court for an extension of time to file a joint letter regarding the case with a proposed case management plan and scheduling order and Plaintiff consents to the relief requested herein.

¹ Pursuant to Rule 1.G. of Your Honor’s Individual Rules and Practices, the request must generally be made at least 48 hours prior to the original due date “absent an emergency.” However, Defendants submit that emergency circumstances exist as due to a planned vacation, the parties are unable to comply with the court ordered deadline.

Hon. Vernon S. Broderick, U.S.D.J.

August 16, 2024

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Thank you for your consideration of this matter.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "RJ Carta". The signature is written in a cursive, flowing style.

Raymond J. Carta

cc: All Counsel of Record (*via* ECF)